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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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MICHAEL SABELLA,	:	Docket No.: 06-cv-6566
	:	(NG-SMG)
Plaintiff,	:	
v.	:	
AMERICAN STEVEDORING, INC., and	:	
LOCAL 1814 INTERNATIONAL LONGSHOREMEN'S	:	
ASSOCIATION, AFL-CIO	:	
Defendants.	:	
-----X		

DEFENDANT AMERICAN STEVEDORING, INC.'S RULE 50(b) MOTION

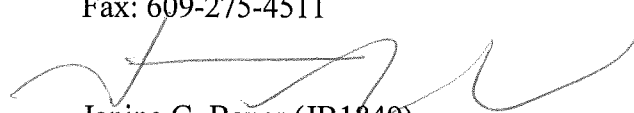
PLEASE TAKE NOTICE, that based upon the accompanying Memorandum of Law, and Szaferman, Lakind, Blumstein & Blader, P.C., counsel for Defendant American Stevedoring, Inc., hereby moves this Court, the Honorable Nina Gershon, United States District Court Judge for the Eastern District of New York, at the Courthouse for the Eastern District of New York, 225 Cadman Plaza East , Room 1217, Brooklyn, New York 11201, at a date and time to be determined by the Court, for:

1. An Order vacating or reducing the punitive damages award on the Plaintiff's retaliation claim;
2. An Order directing a verdict in American Stevedoring, Inc.'s favor as a matter of law under the New York City Human Rights Law on Plaintiff's hostile work environment

claim because Mr. Buzzetta did not have authority to direct the Plaintiff's daily work activities, and therefore, he was not Plaintiff's supervisor, and if he was a co-worker, ASI proved the defenses under Section 8-107(b)(2) and (3), and is therefore not liable on the hostile work environment claim as a matter of law; and

3. Such other and further relief as the Court deems just and proper.

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Dated: December / 7 , 2014